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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF GOOGLE'S
ADMINISTRATIVE MOTION TO SEAL
JOINT DISCOVERY STATEMENT
PURSUANT TO DKT. 133, 133-1**

Referral: Hon. Susan van Keulen, USMJ

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s
7 Administrative Motion to Seal portions of the parties’ Joint Discovery Statement submitted pursuant
8 to the Court’s April 13 Discovery Order, Dkt. 133, 133-1 (“Joint Discovery Statement”). In making
9 this request, Google has carefully considered the relevant legal standard and policy considerations
10 outlined in Civil Local Rule 79-5. Google makes this request with the good faith belief that the
11 information sought to be sealed consists of Google’s confidential and proprietary information and
12 that public disclosure could cause competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portions of the Joint
14 Discovery Statement, attached hereto as Exhibit A.

15 4. Some of the information requested to be sealed contains Google’s highly confidential
16 and proprietary information regarding highly sensitive features of Google’s internal systems and
17 operations, including details related to the various types of unauthenticated identifiers/cookies
18 Google uses internally and their proprietary functions, that Google maintains as confidential in the
19 ordinary course of its business and is not generally known to the public or Google’s competitors.

20 5. Such confidential and proprietary information reveals Google’s internal strategies,
21 system designs, and business practices for operating and maintaining many of its important services,
22 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-
23 3.

24 6. Public disclosure of such confidential and proprietary information could affect
25 Google’s competitive standing as competitors may alter their identifier and cookie system designs
26 and practices relating to competing products. It may also place Google at an increased risk of cyber
27 security threats, as third parties may seek to use the information to compromise Google’s identifier
28 system.

7. The other information requested to be sealed in Chart C of the Joint Discovery Statement contains, summarizes, or otherwise reflects material Plaintiffs have designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only,” which I have provided below in accordance with Civil Local Rules 79-5(d) and (e):

Document	Portions to be Filed Under Seal
Joint Discovery Statement, Chart C	Portions Highlighted in Blue at pages 30-32 (Interrogatory No. 2), 36-37 (Interrogatory No. 5)

8. For these reasons, Google respectfully requests that the Court order the Joint Discovery Statement to be filed under seal.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Los Angeles, California on April 23, 2021.

DATED: April 23, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By



Viola Trebicka

Attorney for Defendant